

1 **STIP**  
2 ADAM L. GILL, ESQ.  
3 Nevada State Bar No. 11575  
4 723 South 3rd Street  
5 Las Vegas, NV 89101  
6 P: (702) 750-1590  
7 F: (702) 548-6884  
8 Attorney for Defendant  
9 Francisco Mares

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

Case No: 2:20-cr-00018-JCM-EJY-2

13 Plaintiff,

14 vs.

**STIPULATION TO CONTINUE  
REVOCATION OF PRETRIAL RELEASE  
HEARING  
(First Request)**

15 FRANCISCO MARES,

16 Defendant,

17 IT IS HEREBY STIPULATED AND AGREED, by and between Defendant  
18 FRANCISCO MARES, by and through his counsel, ADAM L. GILL, ESQ. and the United States  
19 of America, by its counsel, ALLISON REESE, ESQ., Assistant U.S. Attorney, that the  
20 Revocation of Pretrial Release Hearing in the above-captioned matter currently set for October  
21 27, 2021 at 11:00 a.m. be continued to at least 90 days.

22 This stipulation is entered for the following reasons:

- 23 1. Counsel needs additional time to prepare sentencing mitigation materials.
- 24 2. Mr. Gill has spoken with Mr. Mares and he agrees with this continuance.
- 25 3. Mr. Gill has spoken to Ms. Reese and Ms. Reese has indicated that she has no  
26 objection to this continuance.
- 27 4. Additionally, denial of this request for continuance could result in a miscarriage of  
28 justice.
5. In addition, the continuance sought is not for delay and the ends of justice are in fact

1 served by the granting of such continuance which outweigh any interest of the public  
2 and the defendant in proceeding with the hearing on October 27, 2021.

3 DATED this 7th day of October, 2021.

4  
5 /s/ Adam L. Gill

6 Adam L. Gill, Esq.  
7 Counsel for Defendant  
8 Francisco Mares

9 /s/ Allison Reese

10 Allison Reese, Esq.  
11 Attorney for the United States  
12 Assistant United States Attorney  
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**FOF**

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Attorneys for Defendant  
Francisco Mares

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FRANCISCO MARES

Defendant.

Case No: 2:20-cr-00018-JCM-EJY-2

**ORDER**

**FINDINGS OF FACT**

Based on the stipulation of Counsel, and good cause appearing, the Court finds that:

1. Counsel needs more time to prepare sentencing mitigation materials.
2. Mr. Gill has spoken with Mr. Mares and he agrees with this continuance.
3. Mr. Gill has spoken to Ms. Reese and Ms. Reese has indicated that she has no objection to this continuance.
4. Additionally, denial of this request for continuance could result in a miscarriage of justice.
5. In addition, the continuance sought is not for delay and the ends of justice are in fact served by the granting of such continuance which outweigh any interest of the public and the defendant in proceeding with the hearing on October 27, 2021.

**ORDER**

IT IS HEREBY ORDERED, that the Revocation of Pretrial Release hearing, currently scheduled for October 27, 2021, at the hour of 11:00 a.m., be vacated and continued to \_\_\_\_\_, at the hour of \_\_\_\_\_.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE